



**NEWHAM** COMMUNITY  
SCHOOLS TRUST

# **NCST Policy: Modern Slavery and Human Trafficking Statement - 2021/22**

**Last updated: December 2021**

**Approved by: Trust Board, December 2021**

**Applies to: Newham Community Schools Trust**

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# **1. NCST Policy - Modern Slavery and Human Trafficking Statement - 2021/22**

## **1.1. Aims and introduction**

This statement sets out Newham Community Schools Trust's (NCST) actions to understand all potential Modern Slavery risks related to its activity and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its academies and supply chains. This statement relates to actions and activities during the financial year 1st of September 2021 to 31 August 2022.

The Trust acknowledges responsibility to comply with all principles of the Modern Slavery Act 2015 and will perform due diligence to provide transparency throughout the organisation, with particular attention to its schools and to ensure supply chains are free from slavery and human trafficking.

## **1.2. Procurement and supply chain management**

The Modern Slavery Act applies not only to the organisation's own employees but also to suppliers, sub-contractors and other business partners. NCST will not knowingly support or deal with any businesses involved in slavery or human trafficking.

A considerable proportion of our procurement is with suppliers who are pre-approved either by a purchasing consortium or appointed through means of a tender process. As part of our initiative to identify and mitigate risk, we will ensure that suppliers are required to provide a warranty to comply with the Modern Slavery Act 2015. We reserve the right to exclude any bidder who has been convicted of an offence under the Modern Slavery Act 2015.

Our supply chains may include the following works, goods and services but not limited to:

- education equipment, textbooks and resources suppliers
- educational data, training and support services
- student and staff uniform suppliers
- estate management maintenance and services
- ICT equipment and services
- catering services and supplies
- cleaning services and supplies
- payroll services
- peripatetic music services
- PE and PE coaching services.
- supply/agency staff

We have identified that some of our procurement takes place within sectors where modern slavery offences could occur, such as within our cleaning and catering supply chains and within the maintenance and construction industry. All tenders for supply of services and or goods include a requirement for the supplier to provide assurance of its labour practices and their ethical trading including any of its direct suppliers or subcontractors also comply with the Modern Slavery Act 2015.

We will be taking the following steps to promote awareness of this during 2021/22:

- Raise awareness, via the Operations Group, of all those involved in employment, procurement and management, of the risks of modern slavery occurring within our supply chains.
- Include compliance with the Modern Slavery Act as a condition for specification and tender documents.
- Ensure our 'New Supplier' form requests all suppliers evidence to the Modern Slavery Act.
- Conduct a more in-depth review of our supply chains to better understand the risks of modern slavery occurring within them.

### **1.3. Our policies to resist modern slavery and human trafficking**

We will continue to review our existing policies and procedures in light of the Modern Slavery Act. Among the policies that we consider give us strength in avoiding modern slavery or human trafficking under the Act across our Trust are:

- Code of Conduct
- Safer Recruitment Policy
- Whistleblowing Policy

The Trust's Whistleblowing Policy draws attention to the risk of modern slavery or human trafficking and stresses that a report of concern in relation to these matters can be made under the protection of the Whistleblowing Policy.

We are determined that there shall be no modern slavery or human trafficking at NCST. Our policies evidence our commitment to act ethically and with integrity throughout our Trust and at all our schools.

All tenders for supply of services and or goods include a requirement for the supplier to provide assurance of its labour practices and their ethical trading including any of its direct suppliers or subcontractors also comply with the Modern Slavery Act 2015.

### **1.4. Training and continuing vigilance**

1. We have discussed the Modern Slavery Act, its purpose and the Trust's attitude to it at a Trust Board meeting.
2. We have alerted the our Operations Group to our Modern Slavery Act Statement.
3. We have raised awareness to school leadership teams and challenged them to consider where the risk of modern slavery or human trafficking may arise within our schools.
4. We will provide guidance to those involved in procurement of the need to avoid those risks and on possible indicators of them during the procurement of goods and services, through the work of the Operations Group (delegated to this Group by the Executive Group).
5. We will continue to seek a guarantee from suppliers as to their compliance to the Modern Slavery Act 2015.

## **1.5. Declaration**

This statement has been approved by Newham Community Schools Trust's Board and is made pursuant to section 54(1) of the Modern Slavery Act 2015.

This policy statement will be reviewed by the Trust Board and published.